



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

EPA Region 5 Records Ctr.



314032

REPLY TO THE ATTENTION OF:  
SR-6J

VIA ELECTRONIC MAIL AND CERTIFIED MAIL

September 12, 2008

Weyerhaeuser Company  
Attention: Jennifer Hale  
7800 East Orchard Road, Suite 200  
Greenwood Village, Colorado 80111

Re: Plainwell Mill, Operable Unit #7, Allied Paper/Portage Creek/Kalamazoo River Site  
Comments on Proposed Revisions to *Draft Phase 2 Addendum No. 1 to the Remedial Investigation/Feasibility Study Work Plan*

Dear Ms. Hale:

In July 2008, Weyerhaeuser Company (Weyerhaeuser) submitted a draft Phase 2 Addendum No.1 to the Remedial Investigation/Feasibility Study Work Plan (Work Plan) for the above referenced Site. The United States Environmental Protection Agency (EPA) reviewed and provided comments to that Work Plan in our letter of July 31, 2008. Weyerhaeuser then submitted, via electronic mail, a letter and revision of the Work Plan on August 8, 2008 responding to EPA's comments. After review of Weyerhaeuser response, EPA hereby disapproves Weyerhaeuser's proposed addendum and provides the following comments.

General Comment

Comment 1. Numerous occasions exist in the revision where Part 201 Criteria are referenced and are used to screen historical analytical data. EPA recommends removing references to Part 201 Criteria and including a complete list of detected analytes, or including a complete list of detected analytes and then specifying which analytes exceeded applicable Part 201 Criteria. Ensure the current Part 201 Criteria are referenced and used to screen historical data. In this way, readers will not be misled into conclusions regarding the nature of the historical data.

Specific Comments

Comment 1. The revision does not adequately address Comment 16 of EPA's letter of July 31, 2008. Specifically, the revision does not allow for digging below the water table, flexibility in the number and location of test pits, nor allow for sampling of pooled liquids in

test pits. Please revise the work plan to address Comment 16 of EPA's letter of July 31, 2008. .

Comment 2. The revision states,

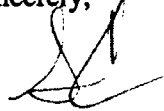
. . . If test pit soils are visually stained or have a strong petroleum odor, excavated soils will be containerized in a small lined 5 cubic yard dumpster for landfill characterization and disposal. . .

EPA recommends using a photo or flame ionization detector in addition to visual and olfactory cues.

Comment 3. The revision states, ". . . Material containing greater than 50 [parts per million] of [polychlorinated biphenyls] will be sent to EQ Wayne Disposal, Inc. in Belleville, Michigan. . ." This would not adequately characterize such waste for disposal. Please revise the statement.

Please revise the Work Plan and associated site plans according to these comments and submit the revisions for review. Thank you for your attention to this matter. Please do not hesitate to call me at 312.886.1434, should you have any questions related to the project.

Sincerely,



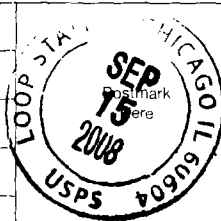
Sam Chummar  
Remedial Project Manager  
Superfund Division  
Remedial Response Branch One  
Remedial Response Section One

cc: Eileen Furey, C-14J  
Nicole Wood, C-14J  
James Saric, SR-6J  
Paul Bucholtz, Michigan  
Department of Environmental  
Quality  
Kathryn Huibregtse, RMT, Inc.  
Michael J. Erickson, Arcadis

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Attn: Jennifer Hale  
7800 East Orchard Road, Suite 200  
Greenwood Village, CO 80111

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Weyerhaeuser Company  
Attn: Jennifer Hale  
7800 East Orchard Road, Suite 200  
Greenwood Village, CO 80111

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Sam Chummar  
U.S. EPA Region 5 (SR-6J)  
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Chicago, IL 60604

